

**IN THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

THOMAS SIERRA	)	
	)	Case No. 1:18-cv-03029
<i>Plaintiff,</i>	)	
	)	Hon. John Z. Lee
v.	)	
	)	Hon. M. David Weisman
REYNALDO GUEVARA, et al,	)	Magistrate Judge
	)	
<i>Defendants.</i>	)	JURY TRIAL DEMANDED
	)	
	)	
	)	

**PLAINTIFF’S MOTION FOR LEAVE TO FILE DOCUMENTS UNDER SEAL**

Pursuant to Local Rules 5.8 and 26.2, Plaintiff THOMAS SIERRA, by and through his attorneys, respectfully requests an Order granting Plaintiff permission to file exhibits to his Rule 72 Objections to Order Denying Plaintiff’s Motion to Compel Production of Documents Relating to the *Klipfel* Lawsuit under seal, stating as follows:

1. Exhibits to Rule 72 Objections to Order Denying Plaintiff’s Motion to Compel Production of Documents Relating to the *Klipfel* Lawsuit, filed concurrently with this motion, will include “Complaint Register” (CR) files that have been marked confidential pursuant to the Court’s protective order in this case. Dkt. No. 123.

2. Accordingly, good cause exists to allow Plaintiff to file these documents under seal rather than publicly.

3. In compliance with Local Rules 5.8 and 26.2, and in accordance with the Protective Order entered in this case, Dkt. No. 123, Plaintiff (a) will provisionally file exhibits to his reply under seal after filing this motion; (b) will file electronically a public-record version of

their exhibits; (c) will redact any reference to files marked confidential in the public-record version of the motion, and (d) is now moving this Court for leave to file under seal.

WHEREFORE, Plaintiff respectfully requests that the Court enter an Order granting him permission to file the aforementioned exhibits under seal.

**Dated: January 29, 2021**

Respectfully submitted,

**THOMAS SIERRA**

BY: /s/ John Hazinski  
*One of Plaintiff's Attorneys*

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**CERTIFICATE OF SERVICE**

I, John Hazinski, an attorney, certify that on January 29, 2021, I filed the foregoing motion using the Court's CM/ECF system, which effected service on all counsel of record.

/s/ John Hazinski  
*One of Plaintiff's Attorneys*